

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	3:15-cr11-01
	§	
DENNIS P.M. HUGHES	§	

**HUGHES' UNOPPOSED MOTION  
TO ALLOW DR. DONNA HUGHES  
TO DISCLOSE ANY AND ALL INFORMATION  
REGARDING INDIVIDUAL COUNSELING**

Dennis P.M. Hughes, through Neal Davis, files this unopposed motion to allow Dr. Donna Hughes to disclose any and all information regarding individual counseling of Dennis P.M. Hughes ("Hughes"), showing specifically:

1. Hughes is charged with several counts involving child pornography. He is pleading on Tuesday, March 22, 2016.

2. Hughes was released on bond and, as a condition of bond, has been undergoing individual counseling with Dr. Donna Hughes as part of his federal treatment program. She is a licensed sex offender treatment provider. Hughes has also gone well beyond this mandatory treatment and has been voluntarily undergoing group treatment with Dr. Hughes as well as regularly attending Sex Addicts Anonymous meetings.

3. Specifically, as part of Hughes' federal treatment plan, he started *individual* treatment on June 19, 2015, and has attended two individual

sessions per month (for a total of 18 sessions). He has had perfect attendance to all of his sessions. He has attended 26 *group* sessions for sexual offenders. These sessions are currently voluntary, and he attends on a weekly basis. He currently also participates in daily SAA meetings by phone. He did attend 2-3 meetings per week in person, in addition to the phone meetings, until in-person meeting was prohibited by US Pre-Trial Services under the conditions of his electronic GPS monitoring.

4. Undersigned has spoken with Dr. Donna Hughes and she is prohibited, unless the Court grants her permission, from disclosing any information regarding Hughes' individual counseling (other than his attendance records) since the counseling was ordered as part of the federal treatment plan and is a condition of release. She has agreed to disclose any and all information about Hughes' individual counseling but she needs a court order to do so.

5. Undersigned moves this Court to allow Dr. Donna Hughes to disclose any and all information regarding individual counseling, including but not limited to her being able to write a letter or report discussing this counseling, for purposes of mitigation and sentencing.

6. Undersigned has emailed prosecutor Sherri Zack and she is unopposed to this request for disclosure. Hughes himself also consents to

disclosure.

Hughes therefore prays that this motion be granted.

Respectfully submitted,

NEAL DAVIS LAW FIRM, PLLC

/s/

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Neal Davis

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Defendant's lawyer

**CERTIFICATE OF CONFERENCE**

I certify I have emailed Assistant United States Sherri Zack about this Motion on March 12, 2016, and she is UNOPPOSED.

/s/

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Neal Davis

**CERTIFICATE OF SERVICE**

I certify that copy of this Motion has been sent to the Assistant United States Attorney on March 18, 2016, via PACER/ECF filing.

/s/

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Neal Davis

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**ORDER**

Whereas, Hughes and his attorney have filed a motion requesting Dr. Donna Hughes to disclose any and all information regarding individual counseling of Dennis Hughes, this motion is GRANTED and Dr. Donna Hughes is hereby granted permission by this Court to discuss and disclose any and all information regarding her individual treatment of Dennis Hughes as part of the federal treatment plan and/or of a condition of pre-trial release.

Signed March \_\_\_\_, 2016.

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UNITED STATES DISTRICT JUDGE